

Vito and Safa Gelardi
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May 5, 2025

RE: **IME Watchdog, Inc. v. Gelardi, et al.**
Case No.: 1:22-cv-1032 (PKC) (JRC)

VIA ECF and E-mail
United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East
Courtroom 4F North
Brooklyn, NY 11201-1804

Dear Judge Chen:

We, Vito and Safa Gelardi, *pro se* Defendants, respectfully write to advise the Court of Plaintiff, IME Watchdog, Inc.'s ("Plaintiff") ongoing disregard for judicial orders in the above referenced matter. Specifically, Plaintiff's Order to Show Cause filed on May 2, 2025 ("OSC"), is a clear violation of Judge James R. Cho's order dated April 30, 2025, which imposed a thirty (30) day stay of all proceedings herein so that *pro se* Defendants can retain new counsel ("Stay Order"). (A copy of the Stay Order is enclosed).

We respectfully request and urge the Court to strike Plaintiff's OSC from the docket to preserve *pro se* Defendants' rights during the stay period.

The urgency of this request cannot be understated. Plaintiff's OSC not only undermines the Stay Order's clear directive but is also highly prejudicial and sabotages *pro se* Defendants' efforts to retain new counsel, as it creates confusion and unnecessary burden.

Plaintiff's egregious and disregard for the Stay Order comes as no surprise. Throughout this litigation, Plaintiff has repeatedly engaged in a pattern of disregard and defiance of Court orders and directives. Examples of Plaintiff's egregious conduct includes, but is not

limited to, refusal to produce Daniella Levi for a deposition and refusal to provide documents substantiating its damages claims as part of its discovery obligations.

We appeal to the Court to preserve *pro se* Defendants' rights in this matter. The Court must see through Plaintiff's nefarious motives here – abusive motion practice to prejudice our ability to find new counsel and push us further into financial ruin.

Accordingly, we respectfully request the Court strike Plaintiff's OSC from the docket, preserve all *pro se* Defendants' rights to adequately and timely oppose any pending motion, and sanction Plaintiff for its disregard of the Stay Order.

We thank the Court for its attention to this urgent matter, and trust that the Court will uphold the integrity of its orders and prevent further abuse of the judicial process.

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Respectfully submitted,

/s/ Safa Gelardi

/s/ Vito Gelardi

Pro se Defendants

CC:

Enclosures